

EXHIBIT U

C L I F F O R D
C H A N C E

CLIFFORD CHANCE US LLP

2001 K STREET NW
WASHINGTON, DC 20006 - 1001
TEL +1 202 912 5000
FAX +1 202 912 6000
www.cliffordchance.com

By E-mail

Direct Dial: +1 202 912 5109

E-mail: Steve.Cottreau@cliffordchance.com

Sean Carter, Esq.
Cozen O'Connor
1900 Market Street
Philadelphia, PA 19103

August 11, 2016

In re Terrorist Attacks of September 11, 2001, 03 MDL 1570

Dear Sean,

Pursuant to Judge Maas' order at the hearing on March 22, 2016, please find attached a supplemental production of Dubai Islamic Bank ("DIB") Bates stamped DIB_004196 to DIB_005023. *See* Tr. of Record, 03 MDL 1570 (Mar. 22, 2016) (hereinafter, "Tr."). This production contains the following categories of documents that the Court has ordered DIB to produce as set forth in my letter of April 13, 2016 (hereinafter, "Letter"):

- (1) electronic transaction records (Letter at 3);
- (2) documents possibly related to the persons involved in the 1998 U.S. embassy bombings (*id.* at 3);
- (3) Fatwa and Sharia Supervisory Board documents (*id.* at 3-4); and
- (4) supplemental account statements through December 31, 2004 (*id.* at 3).

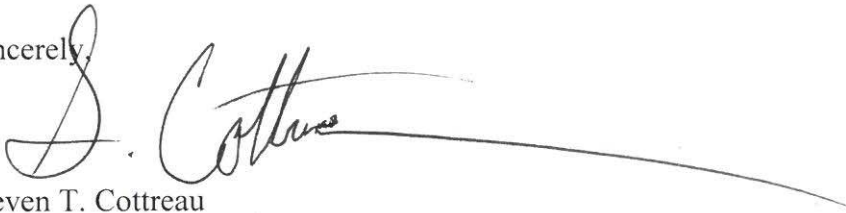
On April 13, 2016, DIB provided you with a list of 422 search terms in order to comply with Judge Maas' March 22, 2016 orders regarding additional search terms. Letter at App. A. In accordance with the Court's March 22, 2016 orders, DIB requested that you supplement this list of 422 search terms up to "not more than 500 names" by April 29, 2016. Tr. at 58. On May 6, 2016, Plaintiffs' Executive Committee requested the production of "responsive documentation relating to the U.S. embassy bombings and associated issues" before providing a list of additional search terms of "not more than 500 names." Letter from S. Tarbutton to S. Cottreau (May 6, 2016); Tr. at 58.

C L I F F O R D
C H A N C E

CLIFFORD CHANCE US LLP

With this enclosed production, DIB has now complied with the Court's order to produce "any electronic transaction data that exists in our primary legacy account record keeping system," documents regarding "investigations or other responses that the bank internally may have had in terms of checking whether it had troublesome accounts or relationships" as a result of the 1998 U.S. embassy bombings, and "all Sharia Board members' names and tenures" during the relevant time period. Tr. 59, 63, & 18. As a result, DIB has now met the condition set forth in your letter of May 6, 2016 regarding your provision of additional search terms. Please provide by September 2, 2016 a revised list of "not more than 500 names" to be searched. We will then move forward to comply with the Court's order regarding a search of these names.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Cottreau", with a long horizontal flourish extending to the right.

Steven T. Cottreau